

24cr70 JWB/JFD

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 371
)	18 U.S.C. § 922(a)(6)
v.)	18 U.S.C. § 924(a)(2)
)	18 U.S.C. § 932(b)(1)
ASHLEY ANNE DYRDAHL,)	
)	
Defendant.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

1. At times relevant to this Indictment:

Introduction

2. Defendant Dyrdahl conspired with Shannon Cortez Gooden to place semiautomatic pistols and semiautomatic rifles in Gooden's hands, despite the fact that she knew that, as a felon, Gooden could not legally possess firearms. Gooden subsequently used firearms that Defendant Dyrdahl supplied to murder two police officers and a firefighter paramedic, and injure a third officer, during an armed stand-off with law enforcement officers who were responding to a call for help. In total, Gooden fired more than 100 rounds of ammunition at the first responders during the attack from firearms Defendant Dyrdahl provided.



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Statutory Framework

3. Title 18, United States Code, Section 922(g) makes it a federal crime for prohibited categories of people to knowingly possess firearms. Included in these prohibited categories are individuals who have been convicted of crimes punishable by imprisonment for terms exceeding one year (felons).

4. Title 18, United States Code, Section 922(d) makes it a federal crime for any person to sell or otherwise dispose of a firearm or ammunition to any person knowing or having reasonable cause to believe that such a person falls into one of these prohibited categories.

5. Any person or business seeking to engage in dealing, manufacturing, or importing of firearms and ammunition must obtain a federal firearms license from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).

6. Federal firearms licensees (FFLs) are required to maintain records of all firearms transfers to transferee/buyers on an ATF Form 4473, which documents the transferee/buyer's name, date of birth, identification, and the buyer's attestation that he or she is not prohibited by Section 922(g) and is the actual transferee/buyer. The ATF Form 4473 includes the following:

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Warning: You are not the actual transferee/buyer if you are acquiring any of the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer any of the firearm(s) to you.

7. The ATF Form 4473 also requires the transferee/buyer to attest that he or she does not plan to sell or otherwise dispose of the firearm to any person who has been convicted of an offense punishable by imprisonment for a term of more than one year.

Background and Purpose of the Conspiracy

8. In 2008, Shannon Cortez Gooden was convicted in Dakota County, Minnesota, of second-degree assault, a crime punishable by imprisonment for a term exceeding one year (a felony offense).

9. Beginning in or around 2016, Defendant Dyrdahl began a domestic relationship with Gooden. As early as 2019, Defendant Dyrdahl knew that Gooden had been convicted of a felony offense. In 2020, Defendant Dyrdahl filed a letter in support of Gooden's petition to restore his firearm rights in which she acknowledged his conviction and crime.

10. Despite knowing of Gooden's felony status, as part of the conspiracy, between September of 2023 and January of 2024, Defendant Dyrdahl purchased five firearms from two different FFLs that Defendant Dyrdahl knowingly and intentionally transferred to Gooden. Defendant Dyrdahl bought the firearms at Gooden's direction, with the intent at the time

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of purchase to transfer the firearms to Gooden to use and possess.

11. Gooden would text firearms that he wanted Defendant Dyrdahl to purchase. She would then place the orders at FFLs, filling out ATF Forms 4473 falsely attesting that she was the actual buyer of the firearm, and falsely attesting that she was not planning to transfer the firearm to a felon.

12. Defendant Dyrdahl and Gooden were aware that this was a crime. For example, on September 10, 2023, Defendant Dyrdahl and Gooden had a text exchange where they discussed background checks and other questions that firearm sellers asked Defendant Dyrdahl. Defendant Dyrdahl said “We just gotta make sure we’re smart about all this ya know?”

13. On September 21, 2023, Defendant Dyrdahl bought a Glock 47 9mm semiautomatic pistol from an FFL. The same day, Defendant Dyrdahl sent Gooden a text asking him how he liked the new gun. Gooden responded with a video in which he displayed the firearm and its attachments, then loaded the firearm with an extended magazine. Defendant Dyrdahl replied “Damn bae [smiling heart emoji],” and Gooden sent Defendant Dyrdahl a “shhh” emoji.

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Fig. 1: The Glock 47 9mm semiautomatic pistol Dyrdahl bought for Gooden.

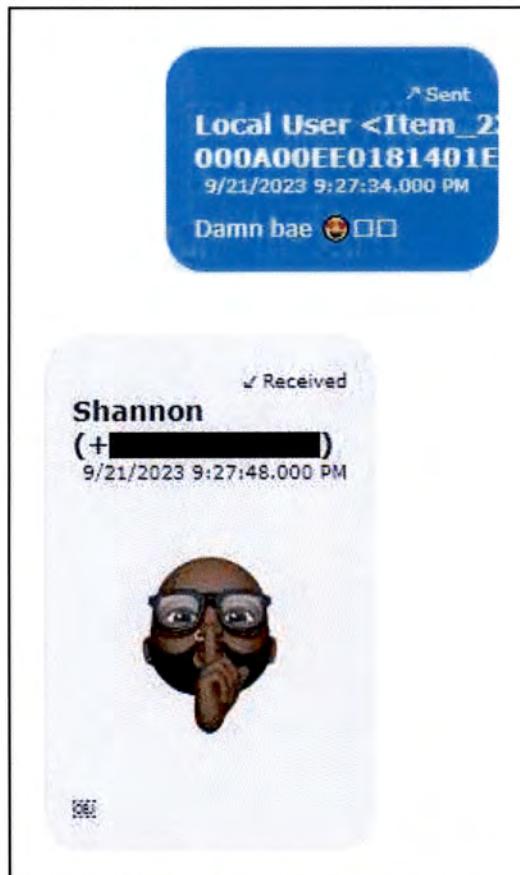


Fig. 2: Dyrdahl's and Gooden's exchange after he showed her the firearm she bought him.

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14. In a text exchange on October 24, 2023, Defendant Dyrdahl and Gooden discussed purchasing another firearm. Defendant Dyrdahl asked Gooden “Can u send me the website u want to order from it might let me just chose a Ffl [sic] like the last one.” Gooden said, “Ok” and sent a link to a Glock 43X 9mm semiautomatic pistol for sale by online firearms dealer Palmetto State Armory (PSA). Defendant Dyrdahl responded “Ok I think psa is the one that let me pick it.” Defendant Dyrdahl then sent a screenshot of several local FFLs near Burnsville to which PSA could ship the firearm. Gooden told Defendant Dyrdahl “Modern” (Modern Sportsman, an FFL in Burnsville, Minnesota). Defendant Dyrdahl responded, “Ok, u wanna send me the money I’ll order it,” to which Gooden replied “Sure thing.” Defendant Dyrdahl then sent a confirmation of purchase of a Glock 43X pistol and said “Ordered.” Gooden responded “Love you.” On October 30, 2023, Defendant Dyrdahl took possession of a PSA Glock 43X pistol at Modern Sportsman, which she subsequently transferred to Gooden.

15. Among the firearms Defendant Dyrdahl bought and transferred to Gooden at Gooden’s request were three semiautomatic AR-15-style rifle lower-receivers. One of these semiautomatic firearm lower-receivers was a Franklin Armory FAI-15 .300 caliber semiautomatic rifle that was equipped with a binary trigger. A firearm with a binary trigger fires one shot when the trigger

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is pulled, and another when the trigger is released, effectively doubling the rate of fire. Defendant Dyrdahl also purchased a .300 caliber barrel for the lower receiver. Defendant Dyrdahl knew that Gooden was loading a semiautomatic AR-15-style firearm with .300 Blackout ammunition. .300 Blackout is a heavier load ammunition, which increases its potential for lethality. Defendant Dyrdahl also bought at Gooden's direction ammunition that Gooden described as "higher pressure" rounds.

16. On February 10, 2024, Gooden went to a shooting range. Gooden and Defendant Dyrdahl had the following text exchange:

Gooden: I love my 300 blackout

Dyrdahl: Haha good baby

17. Later in the thread, Defendant Dyrdahl and Gooden had the following exchange:

Dyrdahl: That's your 300 blackout?

Dyrdahl: Wow

Dyrdahl: [Smiling heart emoji]

Gooden: It's nasty bae

Dyrdahl: hell yeah

...

Gooden: Thanks for making me so happy

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Dyrdahl: You're welcome baby thank you for making me so happy to [sic] . . .

18. On February 18, 2024, Gooden used two AR-15-style semiautomatic firearms Defendant Dyrdahl provided to Gooden—the firearm equipped with a binary trigger and loaded with .300 Blackout ammunition, and a Palmetto State Armory model PA-15 firearm—to ambush police officers and firefighter paramedics who were responding to a call for help in his home. The attack killed two police officers and a firefighter paramedic and injured a third police officer.



Fig. 3: The .300 caliber Franklin Armory FAI-15 .300 caliber semiautomatic firearm equipped with a binary trigger Gooden used in the shooting.

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Fig. 4: A Palmetto State Armory PA-15 .223 caliber semiautomatic firearm Gooden used in the shooting.

19. Gooden fired more than 100 rounds at the first responders during the attack. After the attack, law enforcement officers found in the bedroom Defendant Dyrdahl and Gooden shared a stockpile of fully loaded magazines as well as boxes with hundreds of additional rounds of ammunition and additional firearms.

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Fig. 5: Boxes of ammunition and loaded magazines found in the bedroom Dyrdahl and Gooden shared.

20. In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following overt acts, among others, were committed in the State and District of Minnesota.

21. On or about the dates listed in the table below, Defendant Dyrdahl purchased the following firearms from the following FFLs, which she transferred to Gooden.

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Overt Act	Date of Purchase	FFL	Firearm
1	9/21/2023	Modern Sportsman Burnsville, MN	Glock model 47 9mm semiautomatic pistol bearing serial number CAWW742
2	10/18/2023	Modern Sportsman Burnsville, MN	Palmetto State Armory model Sabre-15 firearm lower receiver bearing serial number SABRE005283
3	10/30/2023	Modern Sportsman Burnsville, MN	Glock model 43X 9mm semiautomatic pistol bearing serial number CALT043
4	1/05/2024	Modern Sportsman Burnsville, MN	Franklin Armory FAI-15 firearm lower receiver bearing serial number A-29064
5	1/25/2024	Burnsville Pistol & Rifle Range Burnsville, MN	Palmetto State Armory PA-15 firearm lower receiver bearing serial number SCB723841

COUNT 1
(Conspiracy)

Between on or about September 21, 2023, and on or about January 25, 2024, in the State and District of Minnesota, the defendant,

ASHLEY ANNE DYRDAHL,

did knowingly and intentionally conspire with Shannon Cortez Gooden to violate Title 18, United States Code, Section 922(g)(1), which makes it a crime to possess firearms as a felon; all in violation of Title 18, United States Code, Section 371.

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COUNT 2-6
(Straw Purchasing)

On or about the dates set forth in the table below, in the State and District of Minnesota, the defendant,

ASHLEY ANNE DYRDAHL,

did knowingly purchase the firearms set forth in the table below, in or affecting interstate and foreign commerce, on behalf of, and at the request of, Shannon Cortez Gooden, knowing and having reasonable cause to believe that Shannon Cortez Gooden had previously been convicted in any court of second-degree assault, a crime punishable by imprisonment for a term exceeding one year:

Count	Date of Purchase	FFL	Firearm
2	9/21/2023	Modern Sportsman Burnsville, MN	Glock model 47 9mm semiautomatic pistol bearing serial number CAWW742
3	10/18/2023	Modern Sportsman Burnsville, MN	Palmetto State Armory model Sabre-15 firearm lower receiver bearing serial number SABRE005283
4	10/30/2023	Modern Sportsman Burnsville, MN	Glock model 43X 9mm semiautomatic pistol bearing serial number CALT043
5	1/05/2024	Modern Sportsman Burnsville, MN	Franklin Armory FAI-15 firearm lower receiver bearing serial number A-29064
6	1/25/2024	Burnsville Pistol & Rifle Range Burnsville, MN	Palmetto State Armory PA-15 firearm lower receiver bearing serial number SCB723841

all in violation of Title 18, United States Code, Section 932(b)(1).

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COUNT 7-11

(False Statement During the Purchase of a Firearm)

On or about the dates set forth in the table below, in the State and District of Minnesota, the defendant,

ASHLEY ANNE DYRDAHL,

in connection with the acquisition of the firearms set forth in the table below, from the federally licensed dealers of firearms (FFLs) within the meaning of Chapter 44, Title 18, United States Code set forth in the table below, knowingly made false and fictitious written statements to the FFLs, which statements were intended and likely to deceive the FFLs as to a fact material to the lawfulness of such sale of the firearm to Defendant Dyrdahl under Chapter 44 of Title 18, in that Defendant Dyrdahl executed Bureau of Alcohol, Tobacco, Firearms and Explosives Forms 4473 in connection with the purchases of the firearms, on which forms Defendant Dyrdahl indicated that she was the actual buyer of the firearms, when in fact Defendant Dyrdahl was not the actual buyer of the firearms, and Defendant Dyrdahl then knew she was not the actual buyer of the firearms:

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Count	Date of Purchase	FFL	Firearm
7	9/21/2023	Modern Sportsman Burnsville, MN	Glock model 47 9mm semiautomatic pistol bearing serial number CAWW742
8	10/18/2023	Modern Sportsman Burnsville, MN	Palmetto State Armory model Sabre-15 semiautomatic firearm lower receiver bearing serial number SABRE005283
9	10/30/2023	Modern Sportsman Burnsville, MN	Glock model 43X 9mm semiautomatic pistol bearing serial number CALT043
10	1/05/2024	Modern Sportsman Burnsville, MN	Franklin Armory FAI-15 semiautomatic firearm lower receiver bearing serial number A-29064
11	1/25/2024	Burnsville Pistol & Rifle Range Burnsville, MN	Palmetto State Armory PA-15 semiautomatic firearm lower receiver bearing serial number SCB723841

all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

Counts 1–11 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1) and 934(1) in conjunction with Title 28, United States Code, Section 2461(c).

As a result of the offenses alleged in Counts 1 and 7–11 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms, accessories (including any magazines, switches,

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conversion devices, auto sears, and other firearms parts), and ammunition, involved in, or used in any knowing violation of, the offenses alleged, including, but not limited to, a Glock model 47 9mm semiautomatic pistol bearing serial no. CAWW742; a Palmetto State Armory model Sabre-15 firearm lower receiver bearing serial number SABRE005283; a Glock model 43X 9mm semiautomatic pistol bearing serial number CALT043; a Franklin Armory FAI-15 firearm lower receiver bearing serial number A-29064; a Palmetto State Armory PA-15 firearm lower receiver bearing serial number SCB723841; a Glock 43X, 9mm pistol bearing serial number CAVE032; a Glock 43X multi-caliber pistol bearing serial number CAPU601; a Remington 870 TAC-14 12-gauge shotgun bearing serial number RAF025739; and all ammunition and accessories seized with the firearms described above.

As a result of the offenses alleged in Counts 2–6 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 924(d)(1) and 934(a) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such violations and any firearms and ammunition involved in, or used in any knowing violation of, the offenses alleged, including, but not limited to, a Glock model 47 9mm semiautomatic pistol bearing serial no. CAWW742; a Palmetto State Armory model Sabre-15

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firearm lower receiver bearing serial number SABRE005283; a Glock model 43X 9mm semiautomatic pistol bearing serial number CALT043; a Franklin Armory FAI-15 firearm lower receiver bearing serial number A-29064; a Palmetto State Armory PA-15 firearm lower receiver bearing serial number SCB723841.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON